

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
DWAYNE LEE CARR	:	
	:	CASE NO. 1:17-bk-00987
NIURCA ZENaida CARR	:	
fka Niurca Zenaida Wehler	:	ADVERSARY NO.
Debtor(s)	:	
	:	Nature of Proceeding Motion for relief
Flagstar Bank FSB servicing agent for	:	
Pingora Loan	:	
Servicing, LLC	:	Document #:
Plaintiff(s)/Movant(s)	:	
	:	
DWAYNE LEE CARR	:	
	:	
NIURCA ZENaida CARR	:	
fka Niurca Zenaida Wehler,	:	
Defendant(s)/Respondent(s)	:	

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE ¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance².

Reason for the continuance. Parties need additional time to attempt to resolve the matter

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: April 14, 2020

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
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¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN THE MATTER OF
DWAYNE LEE CARR
NIURCA ZENAIDA CARR**

Debtor(s)

**: CHAPTER: 13
:
:
:
: CASE NUMBER:1:17-bk-00987
:**

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on April 14, 2020 I served a copy of the Request to Continue on the following parties:

Name and Address	Mode of Service
HYUNDAI MOTOR FINANCE CO BANKRUPTCY DEPARTMENT PO BOX 20809 FOUNTAIN VALLEY, CA 92728	First Class Mail, Postage Prepaid
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036	Electronically
DWAYNE LEE CARR NIURCA ZENAIDA CARR 203 SUNSET DRIVE NEW CUMBERLAND, PA 17070	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

Date: 04/14/2020

/s/ Kara K. Gendron
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